



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

April 1, 2010

Mr. Don Striker, Superintendent
New River Gorge National River
104 Main Street
P.O. Box 246
Glen Jean, WV 25846

Re: Draft General Management Plan and Environmental Impact Statement for New River Gorge National River West Virginia, 2009 CEQ #20100018

Dear Mr. Striker:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the New River Gorge Draft General Management Plan (GMP) and Environmental Impact Statement (EIS). The purpose of this GMP/DEIS is to provide a decision-making framework that ensures that management decisions effectively and efficiently carry out the National Park Service (NPS) mission at the New River Gorge. It will guide management decision making at the park for the next 15 to 20 years. The current park boundary is comprised of 72,189 acres. The existing GMP assigns management zoning to approximately 11,000 acres. Based on our review, we offer the following comments for your consideration. EPA has rated the environmental impacts of the DEIS as EC (Environmental Concerns) and the adequacy of the impact statement as 2 (Insufficient Information). A description of our rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

Alternatives:

This document describes five alternatives for future management of New River Gorge National River (Alternative 1-current conditions and four action alternatives). Five broad organizing principals are inherent in each of the action alternatives: visitor experience, natural resource management, cultural resource management, visitor use and visitor facilities, and partnership and cooperative actions.

Alternatives 2 to 5 would have negligible or long-term minor to moderate adverse impacts. The total estimate disturbance area associated with the alternatives range from 180 acres for Alternative 4 to 320 acres for Alternative 5. Best management practices and mitigation measures would be used to reduce the magnitude of anticipated impact to park resources.



Alternative 5 is the preferred alternative. This alternative preserves areas for primitive recreational experiences from end to end of the park. It also includes a north-south thru park connector composed of improved scenic roads and trails that would enable visitors to travel the length of the park; 66.4 % of the park would be managed as back country. Alternative 5 provides the highest degree of protection of park's natural and cultural resources. Approximately 104 miles of new park trails would be developed, mostly by improving existing unmaintained trails, 34 small parking areas to provide trailheads for hikers, climbers, and horseback riders, mostly on existing roads and disturbed areas, two new parking areas would be developed in support of a visitor shuttle system, three new river access and related day use areas would require clearing and alteration of the riparian zone at the river edge, additional campgrounds will be developed/expanded. A new park road on the Highland-Backus Plateau would be developed through expansion of an existing unmaintained road and minor improvements to the existing administrative road to Surprise. Four existing campgrounds in the floodplain would be restored.

Comments:

While this is a management plan and lacks details about specific impacts, additional information should be provided about next steps and NEPA documentation for various projects. We look forward to working with NPS as the projects move forward. The team should look for additional opportunities to avoid and minimize environmental impacts.

Additional information should be included about improvements to area roads and how that will be coordinated with transportation agencies; for example, on page 4-281, "improvements would be made to WV Route 25 from Glen Jean to Southside Junction and to WV Route 25/2 within the town itself."

On page 4-237, it is stated that "if a new river access is developed at Surprise (as in Alternative 3), some facilities would be located in the floodplain and would impact a mature oak-tulip poplar floodplain forest on Red Ash Island. Impacts on the floodplain forest would be mitigated by limiting visitor use facilities in the floodplain to the minimum possible, including an access road, an access trail, small drop off area, disabled river access, and launch site..." It is unclear how the decision would be made about this location in Alternative 5. If this facility is built, additional efforts should be made to avoid and minimize impacts to this area.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



Barbara Rudnick
NEPA Team Leader

